

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ESPERANZA RAMIREZ,

Plaintiff,

vs.

**SAFECO INSURANCE COMPANY
OF INDIANA, RANDALL BYRD, and
ANTHONY HARRIS**

Defendants.

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CASE NO. 4:15-cv-00651

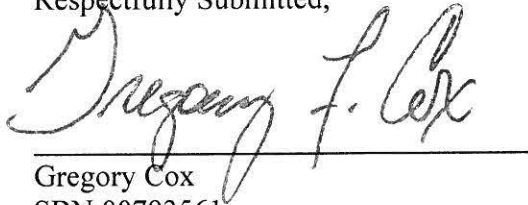
JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff Esperanza Ramirez and Defendants Safeco Insurance Company of Indiana, Randall Byrd and Anthony Harris (collectively, the “Parties”) file this *Joint Motion to Dismiss with Prejudice* and respectfully show the Court as follows:

All matters between the Parties have been fully settled. Accordingly, the Parties now request that this matter, including all claims that have been and/or could have been asserted in this matter, be dismissed in its entirety with prejudice to the re-filing of same.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Esperanza Ramirez and Defendants Safeco Insurance Company of Indiana, Randall Byrd and Anthony Harris respectfully request that the above-styled and numbered case be dismissed in its entirety with prejudice to the re-filing of same with costs of Court to be taxed against the party incurring same.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Gregory F. Cox", is written over a horizontal line.

Gregory Cox

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Respectfully Submitted,

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**ATTORNEYS FOR DEFENDANTS
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ANTHONY HARRIS**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the **Joint Motion to Dismiss with Prejudice** has been forwarded to Plaintiff's counsel of record, as identified below, via electronic means and/or facsimile, on the 18th day of May, 2016, in accordance with the Federal Rules of Civil Procedure:

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